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Attorneys for Defendant

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION**

UNITED STATES OF AMERICA,

Case No.: 5:24-CR-00491 EJD

Plaintiff,

**UNOPPOSED REVISED APPLICATION
AND DECLARATION IN SUPPORT OF
REQUEST FOR TEMPORARY RELEASE
OF PASSPORT; ORDER [PROPOSED]**

vs.

AADITYA CHAND,

Defendant.

I, David R. Callaway, hereby state:

1. I represent Defendant Aaditya Chand, who is charged in a two-count Indictment with violating Title 18, United States Code, Section 875(c).

2. Mr. Chand, age 23, was charged by complaint on August 29, 2024, and made his initial appearance on September 4, 2024. He was released on a \$100,000 unsecured bond, with both of his parents signing on as sureties, and his mother, Jaya Chand, serving as custodian. He also surrendered his passport. Mr. Chand has fully complied with his release conditions.

3. Mr. Chand resides in the United Kingdom, where he is attempting to apply for a work permit – his ability to take any position offered to him being entirely dependent, of course, on what happens with this case. In a prior application to this Court, Mr. Chand requested, and this

1 Court approved (ECF 20), an Order allowing his passport to be surrendered to his custodian, Jaya
 2 Chand, who would retain it in her possession until Mr. Chand's appointment is scheduled to visit
 3 the Consulate, at which point she would accompany him to the appointment and deliver the passport
 4 personally to that office. When the passport is returned, Jaya Chand would also be the one to
 5 receive it, at which point it would be returned to Pretrial Services in accordance with Mr. Chand's
 6 release conditions.

7 4. The reason for this supplemental request – and with apologies for bothering the
 8 Court again – is that Mr. Chand is scheduled to take an exam to become a Chartered Financial
 9 Analyst Level 1 on Friday, February 21, 2025. The exam will be administered by the CFA Institute.
 10 The test location is 2665 North First Street, San Jose, CA 95134, between 8:30 a.m. and 2:00 p.m.
 11 Mr. Chand needs to present valid identification before taking the test. He does not have a driver's
 12 license and so would have to use his passport. We therefore seek the Court's indulgence by adding
 13 the following proviso to the Court's prior Order: "It is hereby further ordered that Defendant may
 14 present his passport to the CFA Institute testing proctors on Friday, February 21, 2025, with such
 15 passport to be returned to his custodian, Jaya Chand, as soon as practicable thereafter, and by no
 16 later than 3:00 p.m. on that date."

17 5. The government has reviewed this application and proposed order and authorized me
 18 to submit it as an unopposed application.

19 I declare under penalty of perjury that the facts set forth in this Request are true and correct,
 20 except as to those matters stated on information and belief and, as to those matters, that I believe
 21 them to be true.

22 Executed this 19th day of February, 2025, at San Jose, California.

23 Respectfully submitted,

24 GLENN AGRE BERGMAN & FUENTES LLP
 25 David R. Callaway

26 By: /s/ David R. Callaway

27 David R. Callaway
 28 Attorneys for Defendant

e Judge